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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

NATALIE OKTEN, *on behalf of herself and those  
similarly situated,*

Plaintiff,

- against -

ARS NATIONAL SERVICES, INC.; and JOHN  
DOES 1 to 10,

Defendants.

Docket No. 22-cv-443

**NOTICE OF REMOVAL**

**TO THE CLERK OF THE ABOVE-ENTITLED COURT:**

**PLEASE TAKE NOTICE**, that pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant ARS National Services, Inc. (“ARS”) hereby gives notice of the removal of this action from the Superior Court of New Jersey, Law Division Special Civil Part, Essex County, where it is now pending, to the United States District Court for the District of New Jersey. In support of this Notice of Removal, Defendant ARS states:

1. On or about December 30, 2021, Plaintiff filed a summons and complaint in this action styled *Natalie Okten, on behalf of herself and those similarly situated v. ARS National Services, Inc.; and John Does 1 to 10*, bearing Docket No. ESX-L-9782-21 before the Superior Court of New Jersey, Law Division Special Civil Part, Essex County. A copy of the Summons and Complaint is annexed hereto as Exhibit A.

2. The Summons and copy of the Complaint was served on ARS on or about December 30, 2021.

3. The Complaint alleges, among other things, that ARS violated the Federal Fair Debt Collection Practices Act, 15 U.S.C. §1692 *et seq.* ARS denies that it violated the law in any way. Accordingly, this action may be removed pursuant to 28 U.S.C. § 1441(b) as this Court has federal question jurisdiction under 28 U.S.C. §1331.

4. Additionally, the Court has supplemental jurisdiction over the state law claims pursuant to 28 U.S.C. §1367.

5. This Notice of Removal is timely filed within thirty (30) days after ARS first received a copy of the initial pleadings setting forth the claims for relief and existence of federal question jurisdiction.

6. A civil cover sheet and the payment of the required filing fee accompany this Notice.

7. Written notice of this Notice of Removal will be filed with the Superior Court of New Jersey, Law Division Special Civil Part, Essex County.

**WHEREFORE**, Defendant ARS, respectfully requests that this action be removed from the Superior Court of New Jersey, Law Division Special Civil Part, Essex County to the United States District Court for the District of New Jersey.

Dated: New York, New York  
January 28, 2022

HINSHAW & CULBERTSON LLP  
*Attorneys for Defendant*  
*ARS National Services, Inc.*

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